

DC

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

) CIVIL RIGHTS COMPLAINT 1983

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### STATEMENT OF FACTS:

Plaintiff, Lamar Thomas was granted Conditional Release (Supervised Release), on November 09, 2015 to the custody of Liberty Healthcare Cooperation Conditional release agent Steve Glazure, from the Chicago Cook County Criminal Courts Building. Located at 2600 South California Chicago Illinois by the Honorable Judge, Alfredo Maldonado. Upon the plaintiff's conditional release, he agreed to follow conditions of his release. In which the plaintiff signed his name besides each condition stating that he understood that he Must follow each rule in his conditional release plan. And the Plaintiff did so.

The plaintiff treatment plan was that he attend and fully participate in treatment with his treatment provider, Ms. Rhonda Meacham. Of Meacham Counseling Services. A small center under contract by Liberty Healthcare. Meacham counseling services provides specific sex offender treatment to the Illinois Sexual Violent Persons whom are Supervised release in the Cook County area. During the plaintiff's release around the holidays, he reported to his treatment provider, Ms. Rhonda Meacham that during the Thanksgiving Holiday he had feelings of loneliness, and boredom. And he thought of removing his ankle system and joining his family for the Thanksgiving Holiday, because its been over 5 to 6 years since he had any interaction with his family. "But I quickly intervened", told myself be patient and things will fall into place the right way and I shall be able to visit my family and friends the right way. The treatment provider, Rhonda Meacham condoned the plaintiff, Lamar Thomas for his Honesty, told him he doing exactly what is expected of him while out on conditional release. The Director, Steve Bryant was told of the plaintiff's and his honesty, and instead of condoning the plaintiff of his honesty, decided over a week later to punish the plaintiff, Lamar Thomas. On or around December 16, 2015 back at the custody of the Department of Human services Treatment & Detention Facility. Located 17019 County farm Road Rushville Illinois 62681. The plaintiff filed an civil rights complaint with the Northern District on, February 05, 2016 before the Honorable Judge, Matthew F. Kennelly, in which was dismissed without prejudice due to the plaintiff has not exhausted all his court proceedings, (State Court etc. App. ect.) However the plaintiff is now back conditionally released. And now is resubmitting this Civil Rights Complaint for being detained illegally by the Director of Liberty Healthcare Steve Bryant and others maybe added upon learning their names and their involvement.

Release date possibly on or around April 15, 2016.

CLAIM ONE:

\_\_\_ The defendant, Steve Bryant was told direct by the Treatment Provider Rhonda Meacham that the Plaintiff, Lamar Thomas disclosed his thoughts in an therapeutic treatment presentation. And that the Plaintiff had done what is expected of all those whom are out on Conditional Release in the Cook County area while in her program. And that is tell the truth, tell her, Ms. Meacham whatever it is on your mind. That way she would be able to assist her clients as an psychologist are suppose to. And that this issue was that of an treatment issue, not a security issue. Because his thought is not punishable, but a behavior is. And that the plaintiff, Lamar Thomas had not displayed any behaviors that would warrant any violation of any conditions of his release. The defendant, Steve Bryant is in violation of the plaintiff's first amendment right "Freedom of expression." And in violation of the 14th Amendment to the United States Constitution, "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, or property without due process of law; nor deny to any person within its jurisdiction the equal protection of the law."

CLAIM TWO:

The defendant, Steve Bryant is in violation of the plaintiff's 6th Amendment to the United States Constitution. This law is civil in nature, but it is also criminal in nature. In all criminal cases, or prosecutions, the accused shall enjoy the right to a speedy trial, and a public trial. by an impartial jury, or a bench, of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witness against him; to have compulsory process of obtaining witnesses in his favor, and to have the assistance of counsel for his defense. In this case, the plaintiff has been asked by the Court, "what Condition of his Release has the plaintiff, Lamar thomas Violated? It is stated on record that the plaintiff has broken **NO** rule of his conditional release. The witness in his favor is his treatment provider, Ms. Rhonda Meacham, which stated, "this is **not** an security issue", this is a treatment issue. The plaintiff expressed his thought to me his treatment provider. This is a thought and not a Behavior. And this Law is related to treatment not punishment, See **Youngberg v. Romeo**, (U.S. Supreme Ct. 1982) 457 U.S. 307, at 321-322, 102 S.Ct. 2452, 73 L.Ed. 2d 28, "**Civil Detainees are entitled to more consideration treatment and conditions of confinement than criminals**"...To punish the plaintiff because a treatment issue when clearly, its just that violates this law mentioned above.

CLAIM THREE

The defendant, Steve Bryant is in violation of Unconstitutional Confinement, The plaintiff, Lamar Thomas is/or has been Illegally confined starting date, on or around, December 16, 2015. Until on or around, '21<sup>st</sup> 2016. Wherefore his case went before the process of the Court and the Plaintiff was cleared of any wrong doing, or any rule violation by the Cook County criminal Courts. Each day confined is a violation of the plaintiff's Constitutional Rights, and this Honorable Court Should award the plaintiff, Lamar Thomas Per day that he the plaintiff has spent illegally, and Unconstitutionally.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court enter Judgement plaintiff A declaration that the acts and omissions described herein violated plaintiff's rights under the Constitution and laws of the United States.

COMPENSATORY damages in the amount of \$450,000.00 against each defendant, jointly and severally.

PUNITIVE damages in the amount of \$1,000.00 dollars per day that the plaintiff was held in confinement Unconstitutionally in the Department Of Human services for unjust causes.

A Jury trial on all issues triable by Jury,  
Plaintiff's cost in his suit.

Any additional relief this Honorable Court deems Just proper, and equitable.

RESPECTFULLY SUBMITTED:



LAMAR THOMAS:

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe them to be true. I Certify under penalty of perjury that the foregoing is true and correct.

LAMAR THOMAS: